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October 24, 2017

VIA ECF

Hon. Tonianne J. Bongiovanni
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608

Re: New Reflections Plastic Surgery LLC v. Reflections Center for Skin and Body, PC,
3:16-cv-08523-FLW-TJB

Dear Judge Bongiovanni:

We represent the Plaintiff in the above referenced matter. In advance of the status conference scheduled for tomorrow afternoon (October 25th), Plaintiff submits this brief update regarding the status of the case. In connection with fact discovery, the parties have completed document production, with the exception of some final follow up matters, all that remains are the two depositions of the parties. These depositions were originally scheduled to take place in October, but on account of a scheduling conflict were adjourned. Fact discovery is currently scheduled to close on October 31, 2017. Plaintiff respectfully requests (and Defendant has indicated it has no objection) extending fact discovery an additional 30 days so that the parties may complete any remaining final document production and the depositions in this matter. The Court's courtesy is much appreciated.

Yours Very Truly,

/s/ Dariush Keyhani
Dariush Keyhani

cc: Defendant's counsel of record